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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBIT 1 TO THE
DECLARATION OF HONG-AN VU IN
SUPPORT OF ITS REPLY IN SUPPORT
OF MOTION TO ENFORCE THE
COURT'S JUNE 7, 2017 ORDER (DKT.
563)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
7 to File Under Seal Exhibit 1 to the Declaration of Hong-An Vu in Support of Its Reply in Support of
8 Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563) (the “Administrative Motion”). The
9 Administrative Motion seeks an order sealing highlighted portions of Exhibit 1 to the Declaration of
10 Hong-An Vu in Support of Its Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order
11 (Dkt. 563) (“Exhibit 1”).

12 3. The portions of Exhibit 1 highlighted in green contain or reference confidential
13 business information, which Waymo seeks to seal.

14 4. Exhibit 1 (portions highlighted green in version filed with Otto Trucking’s corrected
15 Administrative Motion, at Dkt. 1062-3) contain, reference, and/or describe Waymo’s highly
16 confidential and sensitive business information. The information Waymo seeks to seal regards the
17 confidential analysis of Waymo’s highly confidential and sensitive business information. The
18 information Waymo seeks to seal regards the confidential analysis of Waymo’s business and
19 competition, including financial details. I understand that this confidential business information is
20 maintained by Waymo as secret. The public disclosure of this information would give Waymo’s
21 competitors access to in-depth insight into—and analysis of—Waymo’s business strategy for its
22 autonomous vehicle system. If such information were made public, I understand that Waymo’s
23 competitive standing would be significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 1 that merit
25 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on August 1, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7 **ATTESTATION**

8 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
9 document has been obtained from Felipe Corredor.

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11 By: /s/ Charles K. Verhoeven

12 Charles K. Verhoeven
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